

**REMARKS**

**A.) The Section 103 Rejections of Claims 1-6, 9-20, 23 and 24**

Claims 1-6, 9-20, 23 and 24 were rejected under 35 U.S.C. §103(a) as being unpatentable over Marlevi et al., U.S. Patent No. 5,572,221 ("Marlevi") in view of Dunn et al., U.S. Patent No. 6,591,103 ("Dunn"). Applicants respectfully disagree and traverse these rejections for at least the following reasons.

Each of the claims of the present invention includes the feature of, among other things, receiving signals representing a location and corresponding time coordinate of a mobile unit, where the location coordinate is based on GPS data and, thereafter, determining a path of motion for the mobile unit. Neither Marlevi nor Dunn discloses the reception of such signals or the determination of such a path.

Instead, Marlevi discloses a "look-back" technique like that described in the Background of the Invention section of the present application. Marlevi's look-back technique uses a comparison of a previous location with a current location in order to select a "movement circle" or "movement track" of a mobile.

As the Examiner has admitted, Marlevi does not disclose the use of GPS data. In addition, Marlevi's look-back technique does not determine a path of motion based on the reception of location and time coordinates. In fact, there is no disclosure or suggestion in Marlevi that it receives any type of time coordinates whatsoever. Marlevi's "movement tracks" or "movement circles" are based on a comparison of previous locations with a current location; time is not involved in Marlevi's calculations.

With respect to Dunn, except for a general statement that a so-called Central Selection Agency (CSA) determines a direction that is used in calculating an optimum hand-off point,

Dunn is silent as to how such a direction is determined. There is no disclosure of the use of received location and time coordinates which are thereafter used to determine a path of motion, as in the claims of the present invention. In fact, because the Examiner is combining Dunn with Marlevi, the Applicants presume that the Examiner is relying on Marlevi's look-back technique and its movement tracks and circles. As indicated above, such tracks and circles are not akin to, nor suggestive of, the paths of motion in the claims of the present invention.

Accordingly, Applicants respectfully request withdrawal of the pending rejections and allowance of claims 1-6, 9-20, 23 and 24.

**B.) The Section 103 Rejection of Claims 7, 8, 21 and 22**

Claims 7, 8, 21 and 22 were rejected under 35 U.S.C. §103(a) as being unpatentable over Marlevi in view of Dunn and in further view of Yea et al., U.S. Patent No. 6,829,491 ("Yea"). Applicants respectfully disagree and traverse these rejections for at least the following reasons.

As indicated by the Examiner, the combination of Marlevi and Dunn do not disclose the step of "revising [a] protocol database based on service of quality data corresponding to [a] mobile unit." The Examiner attempts to overcome the deficiencies of Marlevi and Dunn by relying on Yea.

Applicant notes however that Yea does not overcome the deficiencies of Marlevi and Dunn raised by the Applicants above. For this reason as well as others, Applicants respectfully submit that the combination of Marlevi, Dunn and Yea does not suggest the subject matter of claims 7, 8, 21 and 22.

Accordingly, Applicants respectfully request withdrawal of the pending rejections and allowance of claims 7, 8, 21 and 22.

**C.) Entry of this Request for Reconsideration**

Entry of this Request for Reconsideration ("Request") is solicited because the Request: (a) places the application in condition for allowance for the reasons discussed herein; (b) does not raise any new issues regarding further search and/or considerations; (c) does not present any additional claims without canceling the corresponding number of finally rejected claims (i.e., the amendments to claims 1, 13, 18, 20, 23 and 24 include features from dependent claims); and (d) places the application in better form for appeal, if an appeal is necessary. Entry of the Request is thus respectfully requested.

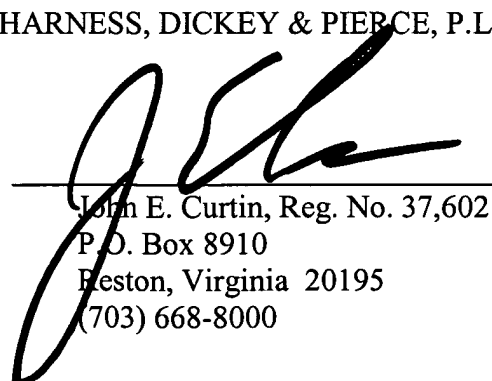
Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact the undersigned below.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

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By: \_\_\_\_\_



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